



OPERATIONAL MEMO

TITLE:	SINGLE ENTRY POINT REQUIREMENTS FOR COMPLETING A SECOND OPTIONAL MEMBER IN-PERSON MONITORING CONTACT
SUPERSEDES NUMBER:	N/A
EFFECTIVE DATE:	JULY 1, 2020
DIVISION AND OFFICE:	CASE MANAGEMENT AND QUALITY PERFORMANCE DIVISION, OFFICE OF COMMUNITY LIVING
PROGRAM AREA:	CASE MANAGEMENT
KEY WORDS:	COVID-19, CORONAVIRUS, CASE MANAGEMENT, FACE-TO-FACE, IN-PERSON, HCBS, MONITORING VISIT, OPTIONAL MONITORING
OPERATIONAL MEMO NUMBER: HCPF OM 20-096	
ISSUE DATE: OCTOBER 27, 2020	
APPROVED BY: BONNIE SILVA	

HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>

Purpose and Audience:

The purpose of this Operational Memo is to inform Single Entry Point (SEP) agencies of the requirements and considerations for completing the second In-Person Monitoring contact that may be completed during a member's certification period.

Information:

Background

On July 1, 2020, the Department of Health Care Policy & Financing (Department) implemented new contracts with the SEP agencies for performing case management services. The new contract requires SEP case managers to complete one In-Person Monitoring contact with Home and Community-Based Services (HCBS) waiver members during their annual certification period, which is a case management billable activity. In addition to the one required In-Person Monitoring contact, the new contract allows for a second In-Person Monitoring contact during the members certification period, when indicated by the member's needs. The second In-Person Monitoring contact is a case

management billable activity put in place to ensure members receive face-to-face contact and case management support following significant changes in life circumstance, care needs or safety events warranting a critical incident report.

Due to COVID-19, the Department directed SEPs to complete the In-Person requirements by telephone or another electronic modality as outlined in [Operational Memo 20-034](#). Case managers should use electronic video (such as Apple FaceTime or Zoom) to complete the required contact, unless the member only has the option to use a telephone.

Information/Procedure

Throughout the duration of the Public Health Emergency resulting from the COVID-19 pandemic, SEP case managers are to complete the one required In-Person Monitoring contact using electronic video unless the member's only option is to use a telephone. The second optional but allowed In-Person Monitoring contact may be completed by electronic modality, when merited by the person's needs.

The current contract identifies some circumstances that may justify an additional In-Person Monitoring:

- Upon transfer from one SEP to another SEP;
- Following a Critical Incident;
- Change in residential setting; or
- Following discharge from a hospital or nursing facility that did not require a Functional Eligibility Assessment.

Although this list is not exhaustive, any factor resulting in an In-Person Monitoring contact for which the SEP intends to seek reimbursement, should rise to the same level of impact on the member as the above listed reasons and, when completed during the Public Health Emergency restrictions by video or phone, will be subject to Department review.

As In-Person visits are currently not allowed under Department issued guidance related to the current Public Health Emergency, SEP case managers must document the rationale for engaging in, what under normal circumstances would be, an In-Person Monitoring contact that is being completed via video or phone. When completing In-Person Monitoring, the SEP case manager must document the rationale for the enhanced level of monitoring and related payment.

The log note documentation should clearly outline:

- The circumstance requiring the monitoring,
- The steps beyond routine monitoring the case manager has taken to assure the health and safety of the member,
- And detailed follow-up needed as an outcome from the monitoring.

Additional information regarding using the Benefits Utilization System (BUS) to properly document In-Person Monitoring during the Public Health Emergency is provided in [Operational Memo 20-076](#). Failure to adequately document justification for performing and billing for a second optional In-Person Monitoring contact via video or phone as outlined above may result in recoupment of funds by the Department.

Attachment(s):

None

Department Contact:

Victor Robertson

victor.robertson@state.co.us